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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**PLAINTIFFS' MOTION TO COMPEL
DEFENDANT TO PRODUCE A LOG OF
COMMUNICATIONS FOR DANA
WHITE'S DISCOVERABLE
TELEPHONE NUMBERS AND
ELECTRONIC COMMUNICATION
DEVICES AND DIRECTING
DEFENDANT TO SUBMIT AN
INVENTORY OF ELECTRONIC
COMMUNICATION DEVICES**

Pursuant to Local Rule 26-7 and Fed. R. Civ. P. 37, Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others similarly situated (collectively, "Plaintiffs"), hereby move this Court to compel Defendant Zuffa, LLC, within five (5) days, to:

(a) Produce a log, for each mobile telephone and electronic device utilized by Zuffa President Dana White during the Relevant Time Period that may contain relevant ESI, that identifies the time, date and, if applicable, duration, of each communication made on each such device, including the telephone number, email address, social media handle or similar identifying information and, if applicable, communications carrier, that each such communication was sent to and from;

(b) Submit to the Court and Plaintiffs a written report regarding Defendant's identification, collection, preservation and production of ESI from the electronic communication devices of Defendant's Ordered and Agreed Custodians that:

(1) Includes an inventory of each Custodian's personal and business electronic devices (including mobile telephone numbers), on or from which potentially relevant information or communication was made, sent, received, viewed or stored during the Relevant Time Period;

(2) For each device responsive to (b)(1) of this Order, states:

a. The model number, telephone number, email address, social media handle or similar identifying information, if applicable, on or from which any information or communication was made, sent, received, viewed or stored during the Relevant Time Period;

b. Whether the device was subject to a litigation hold, the date the litigation hold was implemented and a copy of the litigation hold and the date, if applicable, that the litigation hold was terminated;

c. Whether the device and ESI thereon was inspected by counsel for Defendant;

- d. Without disclosing attorney work product or attorney-client communications, the method used to determine whether the device contained discoverable ESI, i.e., inspection by counsel, a representation by the custodians or otherwise;
- e. Whether ESI was collected from the device, the date of each collection, the date range for the ESI collected from the device and whether the collected ESI was produced to Plaintiffs; and
- f. For any device from which ESI was not collected and produced to Plaintiffs, the reason(s) why.

Attached to this Motion as **Exhibit 1** is a Proposed Order. The grounds for this motion are set forth in the accompanying (1) Memorandum of Law in Support of Plaintiffs' Motion to Compel Defendant to Produce a Log of Communications for Dana White's Discoverable Telephone Numbers and Electronic Communication Devices and Directing Defendant to Submit an Inventory of Electronic Communication Devices; and (2) Declaration of Michael Dell'Angelo.

I hereby certify that Plaintiffs have made a good faith effort to resolve the referenced dispute in accordance with Local Rule 26-7 and Fed. R. Civ. P. 37.

DATED: May 9, 2017

/s/ Michael Dell'Angelo

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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of May, 2017 a true and correct copy of
**PLAINTIFFS' MOTION TO COMPEL DEFENDANT TO PRODUCE A LOG OF
COMMUNICATIONS FOR DANA WHITE'S DISCOVERABLE TELEPHONE
NUMBERS AND ELECTRONIC COMMUNICATION DEVICES AND DIRECTING
DEFENDANT TO SUBMIT AN INVENTORY OF ELECTRONIC COMMUNICATION
DEVICES** was served via email on all parties or persons requiring notice.

/s/ Michael Dell'Angelo